

**TRIGGERS FOCUS GROUP
RECOMMENDATION # 6
ASSESSMENT COMPLETENESS
3 August 2006**

OBJECTIVE OF ASSESSMENT COMPLETENESS: The objective of this requirement is to ensure sufficient monitoring to assess water quality across the entire Coalition region.

PROBLEM STATEMENT: The Assessment Monitoring portion of the tentative MRP states:

“The assessment monitoring of the Long-Term Monitoring Strategy and Implementation Plan shall:

- Focus on a diversity of monitoring sites across the Coalition Group area (hydrology, size, and flow);*
- Evaluate different types of water bodies for assessment;*
- Include a sufficient number of sampling sites to assess the entire Coalition Group area and all drainages;*
- Propose a systematic approach, including timing, to sample initial monitoring sites and sites upstream of initial monitoring sites until the Coalition Group area is fully characterized and assessed;*
- Include sampling sites in areas of known water quality impairments, even if they are not currently identified on the Clean Water Act (CWA) 303(d) listing;*
- Include sampling sites that are compliance monitoring sites for TMDLs, where appropriate;*
- Provide scientific rationale for the site selection process based on historical and/or on-going monitoring, drainage size, and land use;*
- Discuss the criteria for the selection of each monitoring site;*
- Conduct initial focus of the monitoring on water bodies that carry agricultural drainage or are dominated by agricultural drainage;*
- Identify priorities with respect to work on specific watersheds, subwatersheds, and water quality parameters”*

Regional Board staff and Coalition representatives need to be assured that sampling activities adequately monitor the entire Coalition region and identify water quality problems and monitor management practice effectiveness. The tentative MRP requires that all Coalitions develop a Long-Term Monitoring Strategy. The purpose of the Long-Term Monitoring Strategy is “to form and outline an on-going monitoring schedule to assess the Coalition Group in areas in a systematic manner.” The requirements of the Long-Term Monitoring Strategy are flexible and will allow Coalition groups to develop their own approach to monitoring. As such, the tentative MRP does not specify any conditions for completeness of the assessment. Several options are available (Attachment A) such as identifying and sampling all intermediate sized watersheds. Coalitions may select any of the options in the attachment or develop their own approach within the framework of the Long-Term Monitoring Strategy.

RECOMMENDATION:

It is recommended that no new or additional language be inserted into the tentative MRP. Coalitions need to recognize the flexibility in the tentative MRP and the need to develop a scientifically defensible approach to monitoring that assures completeness of the monitoring effort.

TOPIC	OBJECTIVES	OPTION CHOICES	ADVANTAGES	DISADVANTAGES
ASSESSMENT COMPLETENESS	To ensure that monitoring conducted by coalitions is sufficient to allow for an assessment of all of the water bodies that might be affected by irrigated agriculture within the coalition boundaries. Ongoing Monitoring is also necessary to ensure management practice effectiveness, including improvement of water quality conditions where objectives are exceeded, as well as maintenance of conditions where water quality meets beneficial uses.	Long-Term Monitoring Strategy	in Tentative MRP, Oct. 2005, so would require no new language.	
		"At least 20% of the intermediate drainages must be monitored during the first year and the second 20% the second year, etc. Smaller drainages will be monitored if the evaluation of data from the larger drainages or receiving water indicates water quality problems.	in the MRP Order R5-2005-0833, so existing language could be utilized.	The definition of 'intermediate drainage' is not provided.

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		"All major drainages must be part of baseline monitoring:	in the MRP Order R5-2005-0833, so existing language could be utilized.	The definition of major drainages is not provided. Conflicts with language later in the same section "Monitoring sites should not include main-stem waterbodies already on the Clean Water Act section 303(d) listed waterbody", for which the definition of main-stem waterbodies is also not provided.
		Sufficient sampling must take place to monitor the majority (or some pre-determined proportion) of the acreage in the Coalition region.	No specific number or percentage of watersheds is required. Watershed size is not an issue.	May require numerous sites to cover majority of acres. Monitoring could take place on large main-stem water bodies to cover sufficient acreage with fewer sites.

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		Monitoring at any point in time must include 20% (or some other pre-determined proportion) of the acreage in the Coalition region.	Guarantees that the entire Coalition region is monitored eventually. Maintains the monitoring program at a reasonable cost to the Coalitions.	If exceedances exist, it may take several years to cover the Coalition region.
		Identify and monitor watersheds that include the dominant crops in the Coalition region.	Allows focus on most heavily used chemicals instead of monitoring from a large list that may not be used.	No definition of dominant, unclear if this will adequately characterize discharge from irrigated agriculture in Coalition region.